

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
K&L Gates LLP Daniel M. Eliades, Esq. David S. Catuogno, Esq. One Newark Center, 10 th Floor Newark, New Jersey 07102 (973) 848-4000 Daniel.Eliades@klgates.com David.Catuogno@klgates.com Counsel for Valley National Bank	
In Re:	Case No.: 22-11369 SLM
SUSSEX RANDOLPH BUILDING, L.P.,	Chapter: 11
Debtor.	Judge: Hon. Stacey L. Meisel
	Hearing: June 28, 2022 at 11:00 a.m.

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC
STAY PURSUANT TO 11 U.S.C. § 362(d)**

PLEASE TAKE NOTICE that on June 28, 2022 at 11:00 a.m., or as soon thereafter as counsel may be heard, Valley National Bank (“VNB”), a secured creditor of Sussex Randolph Building, L.P. (the “Debtor”), by and through its attorneys, K&L Gates, shall move before the Honorable Stacey L. Meisel at the United States Bankruptcy Court for the District of New Jersey, 50 Walnut Street, Third Floor, Newark, New Jersey 07101-1352, Courtroom 3A, for entry of an Order pursuant to 11 U.S.C. §362(d)(1), (d)(2), and (d)(3) granting VNB relief from the automatic stay under §362, effective immediately, and granting VNB such other relief as may be just and equitable and for such further relief as the Court deems just and proper (the “Motion”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, VNB shall rely upon the Application and the Supplemental Certification of David S. Catuogno in Support of the Motion annexed hereto, Proposed Order filed simultaneously herewith, as well as the prior Certification of David S. Catuogno dated April 18, 2022 (ECF Docket No. 38-2) in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-2(a)(2), any opposition to the Motion must be filed with the Clerk of the Bankruptcy Court and served upon K&L Gates LLP, Attn.: David S. Catuogno, Esq., One Newark Center, 10th Floor, Newark, New Jersey 07102, at least seven (7) days before the hearing date of the Motion. You must also attend the hearing scheduled to be held on **June 28, 2022, at 11:00 a.m.** before the Honorable Stacey L Meisel, United States Bankruptcy Court, King Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey 07101-1352.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion or objection and may enter an Order granting that relief.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

K&L Gates LLP

Attorneys for Valley National Bank

Dated: 6/6/2022

By: /s/ David S. Catuogno
David S. Catuogno